



# TOWN OF ERVING

**P.O.T.W. #1 / Water Dept.**

Tel: 413-423-3354

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**12 East Main Street  
ERVING MASSACHUSETTS 01344**

**Chief Operator / Water Superintendent**

[peter.sanders@erving-ma.gov](mailto:peter.sanders@erving-ma.gov)

**Permit # MA0101052**

January 27, 2022

Justin Pimpare  
Regional Pretreatment Coordinator  
EPA New England  
5 PO Square  
Suite 100 – OEP 06-03  
Boston, MA 02109

Dear Mr. Pimpare

Enclosed is the Pretreatment Report for POTW#2 Permit # MA0101052 for 2021.  
We continue to collect our CA samples at the same time, if possible, with POTW#2 as means of double checking each other. Should you have any questions or concerns please call (413) 423-3354 or email.

Regards,

Peter Sanders  
WW/Water Superintendent – Industrial Coordinator

Cc: Mass DEP, Division of Watershed Management  
Mass DEP, Western Regional Office – Bureau of Resource Protection  
Mass DEP, Bureau of Waste Prevention  
Town of Erving Select Board.

**Town of Erving  
Annual Pretreatment  
Report  
2021**

In accordance with NPDES Permit # MA0101052, (POTW #2), and **40 C.F.R. 403** an annual report summarizing activities and effectiveness of all Pretreatment Programs must be submitted annually to the Environmental Protection Agency. Information requested in **Attachment C, NPDES Permit Requirement** will be addressed below.

1. An updated list of all industrial users by category, as set forth in **40 C.F.R. 403.8(f)(2)(i)**, indicating compliance or noncompliance with the following:
  - Baseline monitoring reporting requirements for newly promulgated industries. **No new industries**
  - Compliance status reporting requirements for newly promulgated industries. **No new industries.**
  - Standards and local limits; **Attachments: Appendix (A) POTW #2 Effluent Monthly Data 2021, Erving Center IPP Metals Log, Erving Center DMR Violation Log,**
2. Summary of compliance and enforcement activities during the preceding year including the number:
  - Significant industrial users inspected. **Erving Paper Mill has not been inspected in 2021 due to covid issues at the Mill.**
  - Significant industrial users sampled. Quarterly Analysis on **Erving Paper Mill effluent on 3/17/2021, 6/2/2021, 11/17/2021, 12/15/2021, CA sampling on 3/17/2021, 6/2/2021, 7/28/2021, 11/17/2021, and 12/15/2021, (split samples QA/QC with POTW #2 lab, BOD, Tss) No Violations. (Appendix C Sampling Analysis 2021) results**
  - Compliance schedules issued. **None**
  - Administrative orders issued. **None**
  - Criminal or civil suits filed. **None**
  - Penalties obtained. **None**
3. Local newspaper list of significantly violating industries required to be published in accordance with **40 C.F.R. 403.8(f) (2) (vii)**; **No publications.**
4. Erving Paper Mill produces a quality tissue grade paper using total recycled paper. Approximately 160-180 tons of paper is recycled daily by 140 employees working a continuous 24 hours/day, seven days a week. The production process halts on major holidays and a maintenance crew covers. The effluent from the mills outfall #001 discharges directly to POTW #2. Sulfuric acid pH adjustment is started at the mills outfall and continues at the headworks of POTW #2. Included is the **Erving Center wastewater Treatment Facility (IPP-Violation Log)** that dates back to 2012 and POTW #2, **DMR Violation**

**Log** that dates back to 2010 and was provided by Ben Thompson, Chief Operator at POTW #2. Ben Thompson has retired December 2021, The new Chief Operator is Ethan Covelli. Erving Industries also owns a subsidiary called Erseco. Erseco is a separate entity from Erving Paper Mill. Erseco staffs and operates POTW # 2. Julie Hubbard is the General Manager for Erseco, and administrates the funding and staffing of POTW #2. Ethan Covelli is the Chief Operator for Erseco and supervises the operation of the wastewater treatment plant. POTW #2 is manned 24 hours a day. Ethan Covelli has a Grade 7C WWTP license. Peter Sanders is the Chief operator for the Town of Erving, he has a Grade 5C WWTP license. He does report, administrate and oversee the operation of POTW #1, 2, & 3. The Chief Operator is an agent for the **Control Authority (Town of Erving)**. The Town of Erving is the NPDES permit holder for POTW #1, 2 and 3. A Pretreatment Agreement exists between the CA and Erving Paper Mill and will be discussed in section (10).

5. A summary of all pollutant analytical results for influent, effluent, and toxicity data from the wastewater treatment facility are included. Included in this report is **Appendix (A)** representing the annual DMR values reported monthly to the Department of Environmental Protection and the Environmental Protection Agency. Also included is the **IPP Metals Log (Toxicity Datta)** that represents quarterly IPP Monitoring of the effluent violations from Erving Paper Mill. The IPP Metals Log tracks violations back to 2012. No interference or pass-through resulted at POTW #2 as a result of the BOD loading. When the original Permit was drafted the Erving Paper Mill was the primary constituent for incoming waste. It has been determined that the BOD loading to the POTW can only be determined from Outfall 001 in the basement of Erving Paper Mill. The Pretreatment Agreement was renewed amended and signed by the Board of Selectman in March 2017. Tighe & Bond participated in resolving the issue of compliance that is based on a combine waste stream at POTW # 2 headworks. Tighe & Bond, the Town of Erving and Erving Paper Mill have all agreed to amend the Permit to specify that Outfall 001 located at Erving Paper Mill basement will be the site of sampling to determine compliance or noncompliance. POTW # 2 provides a service to Septic Service Companies and processing septage is a routine and continual process. It has been determined that the BOD loading from this process can cause an occasional BOD result that reflects negatively towards Erving Paper Mill. The **DMR Violation Log** included represents POTW #2 violations for 2021 and tracks back to 2010.
6. Casella Organics is the contract company that prepares sludge cake from POTW #2 for land application. A Bio mix of sludge and top soil is prepared for land reclamation. Casella Organics specializes in this area and sells the Bio clay mix and oversees projects to promote

vegetative growth. Erseco is responsible for all sludge analysis required.

7. Description of all interferences and pass-through that occurred during past year. **None.**
8. Description of all investigations into interference and pass-through for the past year. **No incidence of interference or pass-through** occurred in 2021 as a result of Erving Paper Mill production process.
9. Description of monitoring, sewer inspections and evaluations that were done over the past year to detect interference and pass-through. **No interference or pass-through occurred in 2021. Erving Paper Mill effluent discharges directly into 14"outfall (OUTFALL 001) that discharges directly to POTW #2.**
10. Description of actions taken to reduce the incidence of significant violations by SIU. **Erving Paper Mill did not have any significant violations. No action was necessary.**
11. Latest adoption of local limits and an indication whether or not the Town is under State or Federal compliance schedule that includes steps to be taken to revise local limits. **The characteristics of Pulp, Paper and Paperboard Manufacturing Point Source Category, Subpart 1 (Secondary Fiber Deink), Existing Source (40 CFR 430.96) categorical discharge must not exceed limits listed in the (TOWN OF ERVING-INDUSTRIAL PRETREATMENT PERMIT COMPLIANCE attachment).** The latest adoption of Local Limits as set forth in 40 CFR Part 403.8(f) (l) (iii) ("POTW Pretreatment Requirements") of the "General Pretreatment Regulations for Existing and New Sources of Pollution," has an Effective Date of: March 5, 2017 and an Expiration Date of March 4, 2022, Wastewater Discharge Permit No. 02-12 is under Federal Compliance Standards and is amended from original agreement dated July 9, 1973. Applicable State and Local Sewer Use laws regulate Erving Paper Mill if more stringent than Federal Schedules. The Pretreatment Permit is due to expire on March 5, 2022. At this time the effectiveness of the IPP Program is rated high. Communication and cooperation exist between Erving Paper Mill, Erseco and the Town.

### **Included with Report**

- 1. Appendix (A) Erving POTW #2 Effluent Monthly Data.**
- 2. Appendix (B) Influent Quarterly Analysis POTW #2.**
- 3. Appendix (C) Sampling Analysis 2021 at Outfall 001.**
- 4. Erving Center Wastewater Treatment Facility (DMR-Violation Log).**
- 5. Erving Center Wastewater Treatment Facility (IPP-Metals Log)**
- 6. EPA Region 1 Annual Pretreatment Summary Sheet 2021.**

Appendix (A) Erving POTW#2 Effluent Monthly Data 2021												
	January	February	March	April	May	June	July	August	September	October	November	December
BOD M. Av. lbs/d Eff	1099	886	1087	574	184	224	155	122	179	145	291	144
BOD Dly. Max. lbs/d Eff	3400	1828	5491	859	314	494	241	169	298	222	520	196
pH Grab Min.	6.5	6.5	6.5	6.7	6.7	6.9	6.9	7.1	7	6.8	6.7	6.8
pH Grab Max	7.2	7	7.3	7.2	7.4	7.3	7.6	7.7	7.4	7.4	7.3	7.5
TSS M. Av. lbs/d Eff	1029	941	716	420	269	350	268	405	317	119	372	168
TSS Dly. Max. lbs/d Eff	2464	3009	3130	930	520	1049	644	947	924	324	1855	404
E.coli#/100ml D/Mx,	seasonal	seasonal	seasonal	233	66	373	95	58	253	36.6	seasonal	seasonal
Phosphorus mg/l	seasonal	seasonal	seasonal	0.06	0.043	0.085	0.13	0.11	0.065	0.22	seasonal	seasonal
Phosphorus D/max	seasonal	seasonal	seasonal	0.12	0.06	0.21	0.31	0.27	0.22	0.48	seasonal	seasonal
Copper T. Max ug/l	18	0	0	0	0	0	0	0	0	0	BDL	BDL
BOD % removal	95.3	96.9	95.9	97.5	99	98.9	99.1	99.3	98.9	99	98	99
TSS % removal	98.6	98.9	99.1	99.5	99.6	99.5	99.6	99.5	99.6	99.6	97.8	99.4
BOD Mon. Avr lbs. Inf.	23482	28644	26572	22642	20175	21213	18746	18186	16637	17638	19508	
TSS Mon. Avr. lbs. Inf.	78225	89546	87492	85001	88457	85454	72827	83105	83971	84972	73389	
Flow 12M/Av mgd	2.7	1.51	1.51	1.52	1.53	1.68	1.69	1.62	1.65	1.64	1.47	1.63
Cl2 Dly Max. mg/l	seasonal	seasonal	seasonal	0.09	0.08	0.08	0.12	0.08	0.08	0.16	seasonal	seasonal
LC50 Static C-dahnia%	>100	quarterly	quarterly	>100	quarterly	quarterly	>100	quarterly	quarterly	>100	quarterly	quarterly
7day chronic Cerdat%	12.50%	quarterly	quarterly	50%	quarterly	quarterly	100	quarterly	quarterly	100%	quarterly	quarterly
Nitrogen Total mg/L	3.3	2.9	4	2.6	3.4	3.4	2	2	1.3	1.5	2	1.5
Nitrite+Nitrate	0	0	0	0	0	0	0	0	0	0	BDL	BDL
N TKN mg/l	3.3	2.9	4	2.6	3.4	3.4	2	2	1.3	1.5	2	1.5
Ammonia&Ammonium	0	0.042	0	0.034	0.035	0	0	0.042	0	0	BDL	
Erving Papermill Effluent IPP Monitoring												
Appendix (B) Influent Quarterly Analysis POTW # 2												
Sample	Arsenic	Cadmium	Chromium	Copper	Lead	Nickel	Silver	Zinc	TSS	Cyanide(T)	BOD	
Date	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	mg/l	mg/l	mg/l	
3/17/2021	ND	ND	12	150	ND	ND	69	450	6025	0.014	1841	
6/2/2021	ND	ND	15	210	13	ND	8.8	720	6180	ND	1786	
11/17/2021	ND	ND	43	690	11	ND	31	550	4883	no samp	1746	
12/15/2021	ND	ND	24	220	ND	ND	ND	790	6211	ND	2021	

### Appendix C Sampling Analysis 2021

Date	Flow mgd	BOD mg/L	BOD lbs	Tss mg/L	Tss lbs
3/17/2021	1.33	1089	12079.00	4168	46232.00
6/2/2021	1.55	1113	14388.00	4924	63653.00
7/28/2021	1.3	1000	10842.00	3864	41893.00
11/17/2021	1.34	817	9130.00	6596	73714.00
12/15/2021	1.31	1064	11625.00	6296	68786.00
Average	1.81	1226.63	11612.80	6710	58855.60
Max	1.55	1113	14388.00	6596	73714.00
Min	1.3	817	9130.00	3864	41893.00

**ERVING CENTER WASTEWATER TREATMENT FACILITY**  
**DMR VIOLATION LOG**

	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
JAN	No violations	No Violations	No Violations	No violations	No Violations	No Violations	No Violations	<b>BOD max.(1)</b> violations	No Violations	No Violations	No Violations	No Violations
FEB	No violations	<b>WET LC50 NOEL</b>	No Violations	No violations	No Violations	No Violations	No Violations	<b>BOD max.(3)</b> violations	No Violations	No Violations	No Violations	No Violations
MAR	Nitrogen not tested	No Violations	No Violations	No violations	No Violations	No Violations	No Violations	No Violations	No Violations	No Violations	No Violations	No Violations
APR	<b>Ecoli max.(1) CU Mo avg.</b>	No Violations	No Violations	<b>BOD max.(3) BOD Mo. Avg .Ecoli max.(2)</b>	No violations	<b>BOD max.(3) BOD Mo avg.</b>	No Violations	<b>TSS max.(1)</b>	No Violations	No Violations	No Violations	No Violations
MAY	No violations	No Violations	<b>Ecoli max.(1)</b>	No Violations	No violations	No Violations	No Violations	No Violations	No Violations	No Violations	No Violations	No Violations
JUN	No violations	No Violations	No Violations	No Violations	No violations	<b>Ecoli max.(1)</b>	No Violations	No Violations	No Violations	No Violations	No Violations	No Violations
JUL	No violations	No Violations	No Violations	No violations	No Violations	No Violations	No Violations	No Violations	No Violations	No Violations	No Violations	No Violations
AUG	No violations	No Violations	No Violations	No violations	No Violations	<b>Ecoli max.(1)</b>	No Violations	<b>Ecoli max.(1)</b>	No Violations	No Violations	No Violations	No Violations
SEP	<b>CU Mo. Avg</b>	No Violations	No Violations	No violations	No Violations	<b>CU mo.avg</b>	No Violations	No Violations	<b>mo.avg. daily max</b>	No Violations	No Violations	No Violations
OCT	<b>CU Mo. Avg</b>	No Violations	No Violations	<b>TSS max.(1) BOD max.(2)</b>	<b>WET NOEL</b>	<b>TSS max.(2)</b>	No Violations	No Violations	No Violations	No Violations	No Violations	No Violations
NOV	No violations	No Violations	No Violations	No violations	No Violations	No Violations	No Violations	No Violations	No Violations	No Violations	No Violations	No Violations
DEC	No violations	No Violations	No Violations	No violations	<b>BOD max.(3) BOD</b>	<b>BOD max.(3) BOD</b>	<b>BOD max.(1)</b>	<b>pH (2)</b>	No Violations	No Violations	No Violations	No Violations



# ERVING CENTER WASTEWATER TREATMENT FACILITY

( IPP Metals )

Date:	Silver ug/L	Arsenic ug/L	Cadmium ug/L	Chromium ug/L	Copper ug/L	Nickel ug/L	Lead ug/L	Zinc ug/L	Tot. Cyanide mg/L	Mercury ug/L	ERSECO BOD mg/L	ERSECO TSS mg/L	Q. MGD	TOE BODmg/L	TOE #BOD	TOE #TSS
3/27/2012	ND	ND	ND	28.0	330.0	ND	ND	760	0.036	ND	1400	9900	1.61	18798		132931
6/19/2012	ND	6.3	ND	ND	4.6	27.0	ND	ND	0.012	ND	2000	6300	1.72	28690		90372
9/25/2012	ND	ND	ND	ND	230.0	24.0	ND	1000	0.018	0.20	1300	6900	1.69	18323		97253
11/29/2012											1199	6356	1.53	15299		81104
2/19/2013	ND	ND	ND	21.0	640.0	ND	15.0	570	0.017	ND	1000	6800	1.57	13094		90347
3/12/2013	ND	ND	ND	15.0	350.0	ND	7.0	960	0.016	ND	380	3800	1.48	4690		46904
6/20/2013	ND	11.0	ND	11.0	130.0	ND	15.0	1200	ND	ND	770	5500	1.31	8413		60090
7/31/2013	ND	ND	ND	14.0	160.0	ND	12.0	480	ND	ND	1005	4260	1.77	14836		62885
11/19/2013	4.3	ND	ND	26.0	330.0	12.0	19.0	1600	ND		937	5260	1.50	11722		65603
6/12/2014	ND	ND	ND	63.0	230.0	28.0	60.0	960		0.23						
7/30/2014	ND	ND	ND	21.0	250.0	23.0	14.0	1200	ND	0.28						
9/23/2014	ND	ND	ND	19.0	250.0	ND	13.0	1000	ND	ND						
12/2/2014	ND	ND	ND	16.0	180.0	12.0	11.0	450	ND	ND	943	4389				
3/25/2015	3.6	ND	ND	21.0	250.0	ND	11.0	680	ND	ND qc	1282	5022	1.67 (1086)	15125	(5769)	80336
6/17/2015	ND	ND	ND	14.0	180.0	ND	13.0	560	ND	ND qc	1779	5972	1.87			
9/16/2015	ND	ND	ND	22.0	320.0	14.0	12.0	900	ND	0.27			1.48			
12/9/2015	ND	ND	ND	24.0	280.0	12.0	15.0	1200	ND	ND			1.57			
3/9/2016	ND	ND	ND	ND	170.0	ND	ND	480	ND	ND qc	1431	4833	1.30 1083 mg/L	4740 mg/L		
6/23/2016	ND	ND	ND	16.0	230.0	ND	13.0	380	ND	ND			1.50 1254 mg/L	5772 mg/L		
9/29/2016	ND	ND	ND	15.0	260.0	ND	12.0	380		ND						
11/8/2016	ND	ND	ND	ND	ND	ND	ND	ND	0.018	ND						
3/27/2017	8.7	ND	ND	22.0	210.0	10.0	ND	1000	no sample	0.29			1.54 (1189)	15271	(4976)	63910
6/27/2017	ND	ND	ND	ND	ND	ND	ND	57	0.016	0.23			1.44 (1341)	16105	(4900)	58847
9/26/2017	ND	ND	ND	8.6	110.0	ND	ND	320	ND	ND			1.44 (1209)	14520	(5440)	66533
12/27/2017	ND	ND	ND	15.0	210.0	ND	ND	440		0.20			1.38 (1122)	12913	(6100)	70206
3/27/2018	ND	ND	ND	8.2	110.0	ND	ND	290	no sample	ND			1.44 (1470)	17654	(5284)	63459
7/24/2018	ND	ND	ND	7.5	94.0	ND	ND	300	0.014	ND qc	1443	3740	1.88 (1261)	19771	(3268)	51240
9/26/2018	ND	ND	ND	ND	ND	ND	ND	ND	no sample	ND			1.49 (1279)	15994	(5616)	69788
12/11/2018	ND	ND	ND	21.0	180.0	ND	12.0	530	0.012	ND			1.01 (1226)	10327	(5156)	43431
12/18/2018	9.1	ND	ND	16.0	140.0	ND	ND	800	no sample	ND			1.32 (467)	5141	(5232)	57598
3/26/2019	ND	ND	ND	13.0	200.0	ND	ND	460	ND	ND qc	4506		1.31 (1121)	13569	(4800)	52442
6/24/2019	ND	ND	ND	29.0	180.0	15.0	15.0	920	0.011	ND	qc	5412	1.36			
11/6/2019	ND	ND	ND	13.0	180.0	ND	ND	430	no sample	0.27	qc	5031	1.32			
11/19/2019	ND	ND	ND	6.9	100.0	ND	ND	320	no sample	ND			1.52			
12/11/2019	8.3	ND	ND	12.0	120.0	36.0	ND	590	no sample	ND			1.53			
6/24/2020	6.1	ND	ND	15.0	190.0	11.0	ND	750	no sample	ND						
10/6/2020	16.0	ND	ND	18.0	240.0	13.0	ND	870	0.013	ND						
11/19/2020	8.6	ND	ND	18.0	87.0	15.0	10.0	730	no sample	ND						
12/2/2020	21.0	ND	ND	29.0	110.0	30.0	13.0	1800	no sample	ND						
3/17/2021	69.0	ND	ND	12.0	150.0	ND	ND	450	0.014	ND						
6/22/2021	8.8	ND	ND	15.0	210.0	ND	13.0	720	ND	ND						
11/17/2021	31.0	ND	ND	43.0	690.0	ND	11.0	550	no sample	ND						
12/15/2021	ND	ND	ND	24.0	220.0	ND	ND	790	ND	ND						

11/21/17 1.42 6124/ (5952) 70488

## EPA Region 1 Annual Pretreatment Report Summary Sheet January 2022

POTW Name:	Erving POTW #2	
NPDES Permit	MA0101052	
Pretreatment Report Period Start Date:	1/1/2021	
Pretreatment Report Period End Date:	12/31/2021	
# of Significant Industrial Users (SIUs):	<input type="text" value="1"/>	
# of SIUs Without Control Mechanisms:	<input type="text" value="0"/>	
# of SIUs not Inspected:	<input type="text" value="0"/>	
# of SIUs not Sampled:	<input type="text" value="0"/>	
# of SIUs in Significant Noncompliance (SNC) with Pretreatment Standards:	<input type="text" value="none"/>	
# of SIUs in SNC with Reporting Requirements:	<input type="text" value="0"/>	
# of SIUs in SNC with Pretreatment Compliance Schedule:	<input type="text" value="0"/>	
# of SIUs in SNC Published in Newspaper:	<input type="text" value="0"/>	
# of SIUs with Compliance Schedules:	<input type="text" value="1"/>	
# of Violation Notices Issued to SIUs:	<input type="text" value="0"/>	
# of Administrative Orders Issued to SIUs:	<input type="text" value="0"/>	
# of Civil Suits Filed Against SIUs:	<input type="text" value="0"/>	
# of Criminal Suits Filed Against SIUs:	<input type="text" value="0"/>	
# of Categorical Industrial Users (CIUs):	<input type="text" value="1"/>	
# of CIUs in SNC:	<input type="text" value="0"/>	

Penalties

Total Dollar Amount of Penalties Collected

\$ 0

# of IUs from which Penalties have been collected:

0

Local LimitsDate of Most Recent Technical  
Evaluation of Local Limits:

Dec 2017

Date of Most Recent Adoption of  
Technically Based Local Limits:

Dec 2017

Pollutant	Limit (mg/l)	MAHL (lb/day)
Aluminum		
Arsenic		
BOD2		25,000M/AV 40,000D/Max
Cadmium		
Chromium		
Copper		
Cyanide (Total)		
Lead		
Mercury		
Nickel		
Oil & Grease (Total)		
Phosphorus		
Silver		
TSS2		70,000M/AV 110,000D/Max
Zinc		
PH	5.5min 9.5 max	
Other		
Flow	2.5mgd M/AV	
	5.0mgd D/Max	
	6.0mgd Instantaneous	